



THE CITY OF SAN DIEGO
MAYOR JERRY SANDERS

MEMORANDUM

RECEIVED
MAR 4 2008
COUNCILMEMBER
DONNA FRYE

DATE: February 26, 2008

TO: Honorable Councilmember Donna Frye, District 6

FROM: William Anderson, FAICP
Deputy Chief Operating Officer: Executive Director of City Planning and Development

SUBJECT: Draft General Plan Concerns - Theoretical Build-out

The following is in response to your concerns regarding the theoretical build-out scenario included in the Draft General Plan Program Environmental Impact Report (PEIR) as stated in your memo dated January 8, 2008.

The theoretical build-out scenario is included in the PEIR to provide the reader with the ability to understand the worst-case scenario of full, but theoretical development of the General Plan. While recent case law requires the theoretical build-out scenario to provide the worst-case scenario, it is well-established planning practice to use a level of development less than the maximum when forecasting or projecting future development at the citywide level. This is done to account for regulatory or physical development issues at the site level that could limit the maximum level of development, since these types of issues cannot be fully known or analyzed at the larger citywide perspective. Also, it is common for development to occur at less than maximum density allowed due to market considerations.

For multifamily residential development, the theoretical build out assumes full development of all multifamily designated land in older urban and suburban communities at the maximum allowable community plan designated density (units per acre). It also assumes that any vacant single-family parcel will be developed with a single family home in older urban and suburban communities. For Downtown, the theoretical build-out assumes the full development build out of the 53,100 units identified in the community plan. In newer planned communities, it uses the SANDAG 2030 forecasted amount of multifamily and single family homes.

For non-residential development, the theoretical build-out for total square footage also assumes the full utilization of the allowable zoning ordinance floor area ratio (FAR) for land designated by an adopted community plan for retail, office, and industrial uses. The theoretical build-out

scenario includes the square footage build-out from the 2006 adopted Downtown Community Plan.

While theoretically possible, units per acre or FAR do not solely control the maximum level of feasible development on a site. Other development regulations and policies including, but not limited to setbacks, coverage, height, parking, and environmental or historical resources can affect the density or intensity of development. All of the City's applicable land use and development regulations and policies, in addition to maximum allowed density or intensity, are used to arrive at a feasible level of development for a particular site.

The attachment to your memo addresses Environmental Sensitive Lands (ESL) and infill development. Depending on the site, the ESL regulations can affect the maximum development density or intensity of a site, but the regulations do not take away all development rights. While it is theoretically possible for an existing development to be demolished and replaced with a new development that will only yield a small increase in units, this is not the norm. Based on current trends, typically infill development in urban communities occurs on sites where the yield in units is much higher than previously existed.

The City works with SANDAG as part of the forecast process every 3 to 5 years to identify potential infill areas in older urban and suburban communities where the yield in units would be substantially greater than what currently exists, based on adopted community plan densities. Historically, the SANDAG forecast models have provided a relatively accurate forecast when comparing the forecasts in retrospect to actual data.

A parcel level of analysis would be time and labor consuming for the City to perform at the citywide level, and is beyond the scope of the General Plan update. As a comparison, the parcel analysis for the Housing Element adequate site inventory was over 1,400 pages in length and took approximately one year to complete, due to the extensive amount of data that needed to be analyzed and limited staff resources.

As part of the community plan update process, the City will evaluate different development scenarios. The existing level of development, the theoretical build-out using maximum allowed community plan and zoning density and intensity levels, as well as any potential regulatory or environmental factors that could affect the build-out will be analyzed. The community and the decision makers can use this analysis as a potential measure to evaluate and recommend potential changes to land use and density and intensity levels.



William Anderson, FAICP
Deputy Chief Operating Officer: Executive Director of City Planning and Development

cc: Betsy McCullough, Assistant to the Director, City Planning & Community Investment
Nancy Bragado, General Plan Program Manager, City Planning & Community Investment
Tait Galloway, Senior Planner, City Planning & Community Investment